

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules to	)	CC Docket No. 94-102
Ensure Compatibility with Enhanced	)	
911 Emergency Calling Systems	)	
	)	
Wireless E911 Phase II Implementation	)	
Plan of Nextel Communications, Inc. and		
Nextel Partners, Inc.	)	

**NEXTEL PARTNERS, INC.  
PHASE I AND PHASE II E911 QUARTERLY REPORT  
August 1, 2003**

**To: Chief, Enforcement Bureau  
Chief, Wireless Telecommunications Bureau**

**INTRODUCTION**

Pursuant to the October 12, 2001 Order of the Federal Communications Commission ("Commission" or "FCC") in CC Docket No. 94-102,<sup>1</sup> Nextel Partner, Inc. ("Nextel Partners") respectfully submits this Enhanced 911 ("E911") Quarterly Report on its implementation of Phase I and Phase II E911. Nextel Partners achieved its first Phase II benchmark, October 14, 2002, when it began selling and activating an Assisted Global Positioning Satellite ("A-GPS") handset. Since that date Nextel Partners has begun selling a second A-GPS handset model and has launched 60 Public Safety Answering Points ("PSAPs") with Phase II service. Herein, Nextel Partners provides an update on all relevant events impacting handset upgrades and network infrastructure necessary to

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems, Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc.*, Order, CC Docket No. 94-102, FCC 01-295, released October 12, 2001 ("Nextel Waiver Order").

enable Phase II E911 location capabilities as well as a listing of all deployed and pending requests for Phase I and Phase II E911 service and the status of each request.

### **BACKGROUND**

Pursuant to the Nextel Waiver Order, the Commission imposed on Nextel Partners and Nextel Communications, Inc. (“Nextel”) the following Phase II E911 implementation benchmarks:

- October 1, 2002:* Begin selling and activating A-GPS-capable handsets;
- December 31, 2002:* Ensure that at least 10% of all new handsets activated are A-GPS-capable;
- December 1, 2003:* Ensure that at least 50% of all new handsets activated are A-GPS-capable;
- December 1, 2004:* Ensure that 100% of all new digital handsets activated are A-GPS-capable;
- December 31, 2005:* 95% of all subscriber handsets in service are A-GPS-capable.<sup>2</sup>

As Nextel Partners has detailed in its previous Reports,<sup>3</sup> Nextel Partners, Nextel and Motorola began developing an A-GPS capability for Nextel’s integrated digital enhanced network (“iDEN”) technology in the Fourth Quarter of 2000, prior to the Commission granting Nextel’s waiver request. Launching a complicated technology to first calculate, and then deliver, location information from an iDEN handset to a PSAP, particularly in the compressed timeline demanded by the Nextel Waiver Order, required extraordinary efforts and unprecedented coordination among numerous entities. This

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<sup>2</sup> Nextel Waiver Order at ¶37.

<sup>3</sup> See, e.g., *Nextel Partners Inc. Phase I and Phase II E911 Quarterly Report*, CC Docket No. 94-102 (Nov. 1, 2002) (“Nextel’s November Report”); *Nextel Partners, Inc. Phase II E911 Quarterly Report*, CC Docket 94-102 (Aug. 1, 2002); *Nextel Partners, Inc. Phase II E911 Quarterly Report*, CC Docket 94-102 (May 1, 2002).

multi-party coordination continues as Nextel Partners and Nextel introduces additional A-GPS capable handsets and deploy individual PSAPs.

## **DISCUSSION**

### **A. A-GPS Capable Handsets**

Following the launch of its first A-GPS capable handset, the i88s, on October 14, 2002 in compliance with its first Phase II implementation benchmark, Nextel Partners introduced its second A-GPS capable handset, the i58sr, on January 1, 2003. Nextel Partners continues to work with its sole handset vendor, Motorola, to develop additional A-GPS capable models, three of which are planned to launch commercially by the end of 2003 commencing at the beginning of the Third Quarter with an aggressive roll out schedule. Nextel Partners, via an independent third-party consultant, completed accuracy testing of its A-GPS handsets prior to its October 14, 2002 benchmark date and met the Commission's accuracy standards. Per Nextel's Waiver Order, the next deployment benchmark period on which Nextel Partners must report ends on November 30, 2003. Nextel Partners will report on that benchmark in its February 2004 Quarterly Report.<sup>4</sup>

### **B. Network Infrastructure**

Nextel Partners remains committed to working cooperatively with PSAPs throughout the country to deploy PSAPs as efficiently as possible and has made notable progress since its May Report. Nextel Partners continues to deploy its two Phase II methodologies, which use Emergency Service Routing Keys ("ESRK") and Emergency Services Routing Digits ("ESRD"), and simultaneously has added further functionalities

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<sup>4</sup> Nextel's Waiver Order states that "Nextel must report, in the Quarterly Report immediately following the benchmark date...for the periods of December 31, 2002 to November 30, 2003..., the percentage of new handsets activated nationwide during the respective periods that were A-GPS capable, as well as the total number of new handsets during those periods that were A-GPS capable." Nextel Waiver Order at ¶ 32.

to its service.<sup>5</sup> In some cases, however, because of complexities inherent in deployments and the numerous parties involved—and despite rigorous network and component testing by Nextel Partners and Motorola prior to its October 1, 2002 Phase II launch—Nextel Partners continues to discover end-to-end connectivity issues with some deployments that can create delay.

When it launched its Phase II service on October 14, 2002, Nextel Partners provided PSAPs a static class of service call identification, which typically was associated with Phase II location information, for all calls. In an on-going effort to provide public safety with the best location information possible on its wireless system, Nextel Partners and Nextel, with the assistance of its third party vendor Intrado, resolved initial technical deployment complexities and began to offer dynamic class of service, which differentiates Phase I from Phase II calls, on July 7, 2003. Initially this functionality has been provided to PSAPs in territories served by Verizon, Sprint and SBC and Nextel Partners anticipates completing rollout, where technically capable, of this functionality to PSAPs in areas served by other local exchange carriers (“LECs”) by the end of September 2003.

On June 6, 2003 the Commission released a Public Notice setting forth uniform requirements governing the Appendix format in which carriers submit both Phase I and

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<sup>5</sup> As Nextel noted in its May 2003 Report, some PSAPs require a Phase II solution using ESRD rather than ESRK, which is the solution Nextel Partners and Nextel supported when they launched their Phase II technology. Either ESRK or ESRD is a technologically acceptable signaling solution to allow the PSAP to obtain E911 Phase II information from the wireless carrier’s network. ESRK may also be referenced as non-call path associated signaling (“NCAS”) or wire line compatibility mode and ESRD may be referenced as hybrid call path associated signaling (“HCAS”).

Phase II deployment information with each Quarterly Report.<sup>6</sup> Per these requirements, Nextel Partners has attached Appendix A, which is discussed in further detail below.

### C. Phase I Requests

With respect to the Commission's requirement that Nextel Partners provide "information on all pending Phase I and Phase II requests,"<sup>7</sup> Nextel Partners has attached Appendix A listing all of its 71 pending Phase I requests and their current status. For each of the on-going Phase I deployment efforts, Appendix A provides all of the required information including the master PSAP registry identification number ("PSAP ID"), PSAP name, PSAP state, PSAP county, request date, whether the request is valid,<sup>8</sup> a projected deployment date, reasons hindering deployment within the first six months of a PSAP's request and comments.<sup>9</sup> The proposed deployment dates in Appendix A are projected dates, which Nextel Partners and the relevant PSAP are striving to meet. Nextel Partners is in regular contact with each of these PSAPs and is working to deploy Phase I E911 as soon as possible. Nextel Partners has fully deployed Phase I E911 service with 435 PSAPs, which are listed on Appendix A.

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<sup>6</sup> Public Notice, *Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, CC Docket No. 94-102, rel. June 6, 2003. According to the Public Notice, "[t]he submission of the attached spreadsheet will permit the Commission to track wireless E911 deployment in a more uniform and consistent manner, as well as assist E911 stakeholders in coordinating their deployment efforts."

<sup>7</sup> See Nextel Waiver Order at ¶32.

<sup>8</sup> Per Nextel's Waiver Order, Nextel Partners is required to report whether it believes each deployment request is (or is not) valid. See Nextel Waiver Order at ¶32.

<sup>9</sup> In some cases there are delays caused by technology issues. Such delays do not necessarily mean that the PSAP or Nextel Partners is not "ready" for Phase I service. Rather, it often means there are issues involving incompatible technologies between Nextel Partners, the LEC and/or the PSAP.

#### D. Phase II Requests

Appendix A provides every pending Phase II request and associated information including the PSAP ID, PSAP name, PSAP state, PSAP county, request date, whether the request is valid,<sup>10</sup> a projected deployment date, reasons hindering deployment within the first six months of a PSAP's request and comments. Nextel Partners has 99 remaining pending Phase II requests and has asked that each of these PSAPs provide the documentation required in the *Richardson Order* for determining the request's validity.<sup>11</sup>

Similar to Phase I deployments, the proposed Phase II deployment dates in Appendix A are projected dates, which Nextel Partners and the relevant PSAP are striving to meet. Nextel Partners reiterates that accomplishing such deployments is subject to numerous factors and parties outside of Nextel Partners' control; thus, Nextel Partners' deployment schedule establishes a goal toward which Nextel Partners will work. It is possible, however, that complexities may be encountered that could delay some PSAP deployments. Nextel Partners is in regular contact with each of these PSAPs and is working to deploy Phase II E911 as soon as possible within mutually agreed upon time frames. Nextel Partners will continue to dedicate significant resources to maintain its aggressive roll out schedule to PSAPs that are capable of receiving and using location technology.

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<sup>10</sup> See note 8 herein.

<sup>11</sup> See generally, *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson*, Order On Reconsideration, CC Docket No. 94-102, FCC 01-293, released November 26, 2002. See also, *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order on Reconsideration*, released Nov. 26, 2002.

Since October 14, 2002, its first implementation benchmark, Nextel Partners has deployed Phase II service with 60 PSAPs, which are included in Appendix A. Notably, of these 60 PSAPs, 29 have been deployed since Nextel Partners' May 1, 2003 Quarterly Report. Nextel Partners remains actively engaged with PSAPs at multiple locations and anticipates deploying Phase II service in additional areas in the near future, including the Commonwealth of Virginia, Jefferson County, KY, and Lubbock County, TX, consistent with mutually agreeable timeframes.

### **CONCLUSION**

As required in the Nextel Waiver Order,<sup>12</sup> Nextel Partners is providing this Quarterly Report to the Executive Directors and counsel of the Association of Public Safety Communications Officials-International, Inc. ("APCO"), the National Emergency Number Association ("NENA") and the National Association of State Nine One One Administrators ("NASNA"). Should any of these organizations or their individual PSAP members have questions or concerns about Nextel Partners' submission, Nextel Partners encourages them to contact Peter Gaffney, at the number listed below, as soon as possible to facilitate rapid and efficient deployment of Nextel Partners' Phase I and Phase II E911 services.

Respectfully submitted,  
Nextel Partners, Inc.

By: \_\_\_\_\_

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<sup>12</sup> Nextel Waiver Order at ¶32.

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